

[*Parties and Counsel Listed on Signature Pages*]

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

**THIS DOCUMENT RELATES TO:**

*People of the State of California, et al. v. Meta Platforms, Inc., et al.*

MDL No. 3047

Case Nos. 4:22-md-03047-YGR-PHK  
4:23-cv-05448-YGR

# META AND STATE AGS' STIPULATION AND [PROPOSED] ORDER EXTENDING CERTAIN EXPERT AND RELATED PRETRIAL DEADLINES

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, the State Attorneys General (“State AGs”) and Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (collectively, “Meta,” and together, the “Parties”), through their undersigned counsel, hereby stipulate as follows:

1. By stipulation of the Parties and Order of the Court (ECF 1955, 2139, and 2251), the expert discovery deadlines relating to two AG-specific experts—Carl Saba, and Patrick McDaniel—were extended to the dates reflected in the second column of the chart below.

2. The Parties have met and conferred over several weeks and agree, subject to Court approval, to extend by approximately three to five weeks the deadlines for (a) Meta’s reports responsive to Saba and McDaniel; (b) the rebuttal reports corresponding to these two experts; (c) the close of expert discovery as related to these two experts and any related responsive and rebuttal experts; and (d) the deadlines for Rule 702 motions as to these experts, as reflected in the chart below.

3. As part of the meet and confer process, the Parties have agreed to disclose certain underlying computer code and inputs used to generate various tables and figures contained in the reports.

a. For Saba’s report, Meta’s reports responsive to Saba, and rebuttal reports corresponding to Saba, the Parties shall produce underlying spreadsheets and models used to calculate the figures and generate the tables contained in the respective reports.

b. For McDaniel’s report, Meta’s reports responsive to McDaniel, and rebuttal reports corresponding to McDaniel, the Parties shall produce the query code used to generate any tables or figures in the reports, as well as a description of the analysis methodology, including the bates numbered data files used, the order of operations used in the analysis, and the data management techniques used.

c. For Meta responsive reports to Saba and McDaniel, and Plaintiff rebuttal reports corresponding to Meta’s responsive expert reports, the parties agree to produce the underlying materials identified in 3a and 3b on the date of the report submission.

4. The Parties have agreed that these disclosures and deadline extensions resolve any dispute regarding the sufficiency or timing of disclosure of code, analysis methodology, or underlying inputs for the Saba and McDaniel reports.

5. Also, as part of the meet and confer process, the Parties have agreed the changes in these deadlines will not affect other deadlines in the case schedule, including existing deadlines for Summary Judgment and other 702 motions.

6. This Court has previously extended expert and Rule 702 motion deadlines, on agreement of all parties to the MDL as part of an MDL-wide schedule extension, *see* ECF 1159, and again as to four State AG-specific experts, including the two experts involved in this extension, on agreement of the State AGs and Meta, *see* ECF 1955, with later, further agreed-upon extensions of expert report deadlines, *see* ECF 2139 and 2251.

7. Therefore, the Parties agree, subject to the Court's approval, that the following deadlines will apply:

Event	Current Deadline	Proposed Deadline
Non-Case Specific and Causation Experts: Defendants' Responsive Reports	<b>December 19, 2025</b> (for Meta's responsive reports to the McDaniel and Saba reports), or approximately 4 weeks after Opening Reports	<b>January 9, 2026</b> (for Meta's responsive reports to the McDaniel and Saba reports)
Non-Case Specific and Causation Experts: Plaintiffs' Rebuttal Reports	<b>January 16, 2026</b> (for the State AGs' rebuttal reports in response to Meta's responsive reports to the McDaniel report), or approximately 4 weeks after Responsive Reports	<b>February 13, 2026</b> (for the State AGs' rebuttal reports in response to Meta's responsive reports to the McDaniel report)
	<b>January 23, 2026</b> (for the State AGs' rebuttal reports in response to Meta's responsive reports to the Saba report), or approximately 5 weeks after Responsive Reports	<b>February 20, 2026</b> (for the State AGs' rebuttal reports in response to Meta's responsive reports to the Saba report)
Close of Expert Discovery	<b>January 30, 2026</b> (for depositions of McDaniel, Saba, Meta's responsive experts, and any AG rebuttal experts), or	<b>March 6, 2026</b> (for depositions of McDaniel, Saba, Meta's responsive experts, and any AG rebuttal experts)

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
	<i>approximately 1 to 2 weeks after Rebuttal Reports</i>	
Rule 702 (Daubert) Motions: Letter Briefs	<p><b>January 5, 2026</b> (for affirmative letter briefs (one brief total per side) as to Meta's and the State AGs' Rule 702 motions as to Patrick McDaniel and Carl Saba, Meta's responsive experts to McDaniel and Saba, and any AG rebuttal experts as to those responsive experts)</p> <p><b>January 12, 2026</b> (for any responses to affirmative letter briefs (one brief total per side) as to Meta's and the State AGs' Rule 702 motions as to McDaniel and Saba, Meta's responsive experts, and any AG rebuttal experts)</p>	<p><b>January 23, 2026</b> (for affirmative letter briefs (one brief total per side) as to Meta's and the State AGs' Rule 702 motions as to Patrick McDaniel and Carl Saba, Meta's responsive experts to McDaniel and Saba, and any AG rebuttal experts as to those responsive experts)</p> <p><b>January 30, 2026</b> (for any responses to affirmative letter briefs (one brief total per side) as to Meta's and the State AGs' Rule 702 motions as to McDaniel and Saba, Meta's responsive experts, and any AG rebuttal experts)</p>
Rule 702 (Daubert) Motions: Opening Briefs	<p><b>February 13, 2026</b> (for Meta's and the State AGs' Rule 702 motions as to McDaniel and Saba, Meta's responsive experts, and any AG rebuttal experts), or  <i>2 weeks after the Close of Expert Discovery as to McDaniel and Saba</i></p>	<p><b>March 13, 2026</b> (for Meta's and the State AGs' Rule 702 motions as to McDaniel and Saba, Meta's responsive experts, and any AG rebuttal experts)</p>
Rule 702 (Daubert) Motions: Opposition Briefs	<p><b>March 6, 2026</b> (for Meta's and the State AGs' Rule 702 oppositions as to McDaniel and Saba, Meta's responsive experts, and any AG rebuttal experts), or  <i>3 weeks after Opening Briefs as to McDaniel and Saba</i></p>	<p><b>April 3, 2026</b> (for Meta's and the State AGs' Rule 702 oppositions as to McDaniel and Saba, Meta's responsive experts, and any AG rebuttal experts)</p>
Rule 702 (Daubert) Motions: Reply Briefs	<p><b>March 27, 2026</b> (for Meta's and the State AGs' replies in support of Rule 702 motions as to McDaniel and Saba, Meta's responsive experts, and any AG rebuttal experts), or  <i>3 weeks after Opposition Briefs as to McDaniel and Saba</i></p>	<p><b>April 24, 2026</b> (for Meta's and the State AGs' replies in support of Rule 702 motions as to McDaniel and Saba, Meta's responsive experts, and any AG rebuttal experts)</p>

**IT IS SO STIPULATED AND AGREED.**

Respectfully submitted,

DATED: December 16, 2025

By: /s/ Megan O'Neill

**ROB BONTA**  
Attorney General  
State of California

Nicklas A. Akers (CA SBN 211222)  
Senior Assistant Attorney General  
Bernard Eskandari (SBN 244395)  
Emily Kalanithi (SBN 256972)  
Supervising Deputy Attorneys General  
Nayha Arora (CA SBN 350467)  
Megan O'Neill (CA SBN 343535)  
Joshua Olszewski-Jubelirer (CA SBN 336428)  
Marissa Roy (CA SBN 318773)  
Brendan Ruddy (CA SBN 297896)  
Deputy Attorneys General  
California Department of Justice  
Office of the Attorney General  
455 Golden Gate Ave., Suite 11000  
San Francisco, CA 94102-7004  
Phone: (415) 510-4400  
Fax: (415) 703-5480  
[Megan.O'Neill@doj.ca.gov](mailto:Megan.O'Neill@doj.ca.gov)

*Attorneys for Plaintiff the People of the State of California*

**PHILIP J. WEISER**  
Attorney General  
State of Colorado

/s/ Krista Batchelder  
Krista Batchelder, CO Reg. No. 45066,  
*pro hac vice*  
Deputy Solicitor General  
Shannon Stevenson, CO Reg. No. 35542, *pro hac vice*  
Solicitor General  
Elizabeth Orem, CO Reg. No. 58309, *pro hac vice*  
Assistant Attorney General  
Colorado Department of Law  
Ralph L. Carr Judicial Center  
Consumer Protection Section  
1300 Broadway, 7th Floor  
Denver, CO 80203

1 Phone: (720) 508-6651  
2 krista.batchelder@coag.gov  
3 Shannon.stevenson@coag.gov  
Elizabeth.orem@coag.gov

4 *Attorneys for Plaintiff State of Colorado, ex rel.*  
5 *Philip J. Weiser, Attorney General*

6 **RUSSELL COLEMAN**  
7 Attorney General  
Commonwealth of Kentucky

8 /s/ Philip Heleringer  
9 J. Christian Lewis (KY Bar No. 87109),  
10 *Pro hac vice*  
Philip Heleringer (KY Bar No. 96748),  
11 *Pro hac vice*  
Zachary Richards (KY Bar No. 99209),  
12 *Pro hac vice*  
Daniel I. Keiser (KY Bar No. 100264),  
13 *Pro hac vice*  
Matthew Cocanougher (KY Bar No. 94292),  
14 *Pro hac vice*  
Assistant Attorneys General  
15 1024 Capital Center Drive, Suite 200  
Frankfort, KY 40601  
16 CHRISTIAN.LEWIS@KY.GOV  
PHILIP.HELERINGER@KY.GOV  
17 ZACH.RICHARDS@KY.GOV  
DANIEL.KEISER@KY.GOV  
18 MATTHEW.COCAPOUGH@KY.GOV  
Phone: (502) 696-5300  
19 Fax: (502) 564-2698

20 *Attorneys for Plaintiff the Commonwealth of Kentucky*

21 **MATTHEW J. PLATKIN**  
22 Attorney General  
State of New Jersey

23 /s/ Kashif T. Chand  
24 Kashif T. Chand (NJ Bar No. 016752008),  
*Pro hac vice*  
25 Assistant Attorney General  
Thomas Huynh (NJ Bar No. 200942017),

1                   *Pro hac vice*

2                   Assistant Section Chief, Deputy Attorney General  
3                   Verna J. Pradaxay (NJ Bar No. 335822021),

4                   *Pro hac vice*

5                   Mandy K. Wang (NJ Bar No. 373452021),

6                   *Pro hac vice*

7                   Deputy Attorneys General

8                   New Jersey Office of the Attorney General,  
9                   Division of Law

10                  124 Halsey Street, 5th Floor

11                  Newark, NJ 07101

12                  Tel: (973) 648-2052

13                  Kashif.Chand@law.njoag.gov

14                  Thomas.Huynh@law.njoag.gov

15                  Verna.Pradaxay@law.njoag.gov

16                  Mandy.Wang@law.njoag.gov

17                  *Attorneys for Plaintiffs New Jersey Attorney General  
18                  and the New Jersey Division of Consumer Affairs*

19                  *Matthew J. Platkin, Attorney General for the State of  
20                  New Jersey, and Elizabeth Harris, Acting Director of  
21                  the New Jersey Division of Consumer Affairs*

1 By: /s/ James P. Rouhandeh

2 **DAVIS POLK & WARDWELL LLP**

3 James P. Rouhandeh, *pro hac vice*  
4 Antonio J. Perez-Marques, *pro hac vice*  
5 Caroline Stern, *pro hac vice*  
6 Corey M. Meyer, *pro hac vice*  
7 DAVIS POLK & WARDWELL LLP  
8 450 Lexington Avenue  
9 New York, New York 10017  
10 Telephone: (212) 450-4000  
11 Facsimile: (212) 701-5800  
12 rouhandeh@davispolk.com  
13 antonio.perez@davispolk.com  
14 caroline.stern@davispolk.com  
15 corey.meyer@davispolk.com

16 **COVINGTON & BURLING LLP**

17 Ashley M. Simonsen, SBN 275203  
18 COVINGTON & BURLING LLP  
19 1999 Avenue of the Stars  
20 Los Angeles, CA 90067  
21 Telephone: (424) 332-4800  
22 Facsimile: + 1 (424) 332-4749  
23 Email: asimonsen@cov.com

24 Phyllis A. Jones, *pro hac vice*  
25 Paul W. Schmidt, *pro hac vice*  
26 COVINGTON & BURLING LLP  
27 One City Center  
28 850 Tenth Street, NW  
Washington, DC 20001-4956  
Telephone: + 1 (202) 662-6000  
Facsimile: + 1 (202) 662-6291  
Email: pajones@cov.com

29 *Attorneys for Defendants Meta Platforms, Inc.;*  
30 *Instagram, LLC; Meta Payments, Inc.; and Meta*  
31 *Platforms Technologies, LLC*

## **SIGNATURE CERTIFICATION**

Under Civ. L.R. 5-1(h)(3), I, Krista Batchelder, hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

DATED: December 16, 2025

/s/ Krista Batchelder

1  
2     **PURSUANT TO STIPULATION, IT IS SO ORDERED.**  
3  
4

5     DATED:  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

---

YVONNE GONZALEZ ROGERS  
UNITED STATES DISTRICT JUDGE